

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

ANDREW SCHERR

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CASE NO. 3:19-CR-00225

UNOPPOSED MOTION TO CONTINUE SENTENCING

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the Defendant, Andrew Scherr, by and through his counsel of record, Alexandra Hunt, and respectfully submits this Unopposed Motion to Continue Sentencing and in support thereof would show the Court as follows:

I.

Relevant Background

As set forth in the Defendant's previous Motion to Continue Sentencing [ECF No. 69], prior to the Court's November 9, 2020 Order granting the Defendant's request for appointed counsel, the undersigned served only in the limited capacity of providing local co-counsel assistance to the Defendant's former lead counsel, Mr. Peter Ginsberg. As such, the undersigned has been working diligently to get up to speed on the substantial body of facts underlying this case, so as to be able to adequately prepare for sentencing. As the undersigned's preparation has continued, however, it has become apparent that despite the diligent nature of these efforts, additional preparation time is nonetheless needed.

II.

Requested Relief

Accordingly, the Defendant respectfully requests a sixty (60) day continuance of the sentencing hearing and related deadlines in this matter. A continuance of the requested length

would be sufficient to allow for proper and adequate preparation for sentencing, yet would not be so long as to cause a substantial delay in these proceedings. Further, the requested continuance is not sought for purposes of delay, but rather so that justice may be served.

WHEREFORE, PREMISES CONSIDERED, for each of the reasons set forth above, the Defendant respectfully requests that the instant motion be, in all things, granted, and that the Court enter an Order continuing the sentencing hearing and related deadlines in this matter by a period of sixty (60) days.

Respectfully submitted,

/s/ Alexandra Hunt

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COUNSEL FOR DEFENDANT SCHERR

CERTIFICATE OF CONFERENCE

I hereby certify that on January 21, 2021, I conferred with counsel for the Government, AUSA Caitlin Cottingham, regarding the foregoing motion and that she is unopposed to the same.

/s/ Alexandra Hunt
ALEXANDRA HUNT

CERTIFICATE OF SERVICE

I hereby certify that on this, the 21st day of January, 2021, a true and correct copy of the foregoing document was filed with the Clerk of the Court for the United States District Court, Northern District of Texas via the electronic case filing system, which provides for service to all counsel of record.

/s/ Alexandra Hunt
ALEXANDRA HUNT